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14 KEUN TAEK PARK

15
16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 SAN FRANCISCO DIVISION
19 TOPPAN PHOTOMASKS, INC.,

Case No. 3:13-cv-3323 MMC

20 Plaintiff,

AMENDED STIPULATION AND
[PROPOSED] ORDER MODIFYING
PRETRIAL PREPARATION ORDER

21 vs.

22 KEUN TAEK PARK, an individual,

Complaint Filed: July 17, 2013

23 Defendant.

Trial Date: April 20, 2015

Judge: Hon. Maxine M. Chesney

STIPULATION

2 Plaintiff Toppan Photomasks, Inc. (TPI) and Defendant Keun Taek Park (collectively
3 "the Parties"), have been engaging in settlement talks since the Court issued the June 20, 2014
4 Stipulation and Order Modifying Trial Prep Order (Dkt. No. 94), and continued progress is
5 being made toward resolving this matter. In order to facilitate further settlement discussions,
6 the Parties stipulate and request that the following dates in the Pretrial Preparation Order (Dkt.
7 No. 53) and Stipulations and Orders Regarding Discovery (Dkt. Nos. 77 & 86 & 94) be
8 modified as follows:

- Non-Expert Discovery Cutoff extended from September 12, 2014 to October 3, 2014;
- Designation of Experts extended from October 2, 2014 to October 24, 2014;
- Designation of Rebuttal Experts extended from October 24, 2014 to November 14, 2014;
- Expert Discovery Cutoff extended from November 14, 2014 to December 5, 2014;

16 Dispositive Motions filing deadline remains December 19, 2014. The Meet and
17 Confer date (Civil Local Rule 16-10(b)(5)) remains March 3, 2015. The Pretrial Conference
18 date remains April 7, 2015 at 3:00 pm and the Jury Trial date remains April 20, 2015 at 9:00
19 am, Courtroom 7, 19th Floor.

In addition, to facilitate further settlement discussions, the Parties further stipulate and request that:

22 (a) all discovery is stayed until September 2, 2014, after which the Parties may not
23 serve new written discovery on each other without mutual agreement or order of the Court;
24 and

25 (b) the filing of a briefing schedule stipulation and the further briefing ordered by
26 Magistrate Judge Spero in his May 29, 2014 and June 17, 2014 Orders on TPI's Motion for
27 Sanctions be stayed until September 2, 2014, after which date the Parties shall file within
28 eleven days a briefing schedule stipulation.

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2 SO STIPULATED.

3 DATED: August 13, 2014

THE BUSINESS LITIGATION GROUP, P.C.

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By: /s/ Will B. Fitton

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MARC N. BERNSTEIN
WILL B. FITTON

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Attorneys for Defendant
KEUN TAEK PARK

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8 DATED: August 13, 2014

9 OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

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By: /s/ Danielle L. Ochs

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DANIELLE L. OCHS
BECKI D. GRAHAM

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Attorneys for Plaintiff
TOPPAN PHOTOMASKS, INC.

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2 **ATTESTATION OF CONCURRENCE IN FILING**
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4 In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of
5 this document has been obtained from Will B. Fitton.
6

7 DATED: August 13, 2014
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9 OGLETREE, DEAKINS, NASH, SMOAK &
10 STEWART, P.C.
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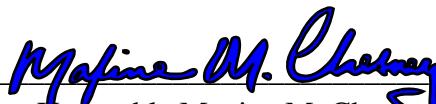
12 By: /s/ Danielle L. Ochs
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14 Attorneys for Plaintiff
15 TOPPAN PHOTOMASKS, INC.
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17 **ORDER**
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19 IT IS SO ORDERED, with the exception of page 1, paragraph (b), which stipulation
20 must be submitted for approval to Magistrate Judge Spero.
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22 Dated: August 15, 2014
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24 
25 Honorable Maxine M. Chesney
26 United States District Judge
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